



**U.S. Department of Justice
Drug Enforcement Administration**

South Central Laboratory
Dallas, TX

Chemical Analysis Report

ICE - Dallas Office
125 E. John Carpenter Freeway, Suite 800
IRVING, TX 75062

Case Number: [REDACTED]
LIMS Number: 2021-SFL6-03586

Observations, Results and Conclusions:

Exhibit	Substance(s) Identified	Net Weight	Substance Purity	Amount Pure Substance
1	Cocaine	25.00 kg ± 0.06 kg	----	----

Remarks:

The net weight is an extrapolated value based on the individual weights of 9 units. The net weight uncertainty value represents an expanded uncertainty estimate at the 95% level of confidence.

Exhibit Details:

Date Accepted by Laboratory:	04/28/2021	Gross Weight:	28.39 kg	Date Received by Examiner:	05/12/2021
Exhibit	No. Units	Pkg. (Inner)	Form	Reserve Wt.	
1	25	Multilayered Packaging	Powder	25.00 kg	

Remarks:

1.1 gram removed from each of 3 containers for special program.

Exhibit Analysis:

Sampling:

Cocaine confirmed in 16 units tested of 25 units received indicating, to at least a 95% level of confidence, that at least 90% of the units in the population contain the substance(s).

Exhibit Summary of Test(s)

1 Cobalt (II) Thiocyanate Color Test, Gas Chromatography/Mass Spectrometry

The terminology used in the preparation of this report is consistent with the current Department of Justice Uniform Language for Testimony and Reports for General Forensic Chemistry and Seized Drug Examinations.

Analyzed By: /S/ Angela M. Cassady, Senior Forensic Chemist

Date: 05/21/2021

Approved By: /S/ Michael J. Morley, Supervisory Chemist

Date: 05/21/2021



Angela M Cassady, MS
Department of Justice
Drug Enforcement Administration
Office of Forensic Sciences

Senior Forensic Chemist
South Central Laboratory
Dallas, TX

AREA OF EXPERTISE

Forensic Discipline

Seized Drug Analysis
Forensic Toxicology (2001-2010)

Expert Testimony

Testified a total of approximately 67 times. Past four years as follows:

11/15/2022	State District Court	Rockport, Texas	Texas vs Adams
11/03/2022	US District Court	Tulsa, OK	US vs Johnson et al
09/21/2022	US District Court	Del Rio, Texas	US vs Sanchez
02/08/2022	US District Court	Oklahoma City, OK	US vs Garcia et al
09/28/2021	US District Court	Tulsa, OK	US vs Williams
07/27/2021	US District Court	Muskogee, OK	US vs George
07/15/2021	US District Court	Beaumont, TX	US vs Perez-Gomez et al
06/15/2021	US District Court	McAllen, TX (Zoom)	
05/17/2021	US District Court	McAllen, TX (Zoom)	

PROFESSIONAL EXPERIENCE

Drug Enforcement Administration

Senior Forensic Chemist, South Central Laboratory, (Dallas, TX), June 2010 - Present

Analysis of unknown substances to determine the presence or absence of controlled substances by using accepted chemical tests and instrumental analysis.

Respond to federal law enforcement for clandestine laboratory sampling.

Testify in court as needed

Training

- 11-month in-house training.
- 4-week centralized training.
- 1-week clandestine lab training. Clandestine lab certified.

Kentucky State Police

Forensic Scientist Specialist II, Centralized Forensic Lab, (Frankfort, KY), September-June 2010

Analyze blood and urine samples for alcohol and controlled substances.

Training

- 1-month in-house training

Commonwealth of Kentucky Medical Examiner's Office Toxicology Laboratory
Forensic Scientist Specialist II, Centralized Forensic Lab, (Frankfort, KY), May 2001-Sept 2008

Analyze postmortem samples for the presence of alcohol, drugs and toxins to aide in the determination of cause of death,

Training

6-month initial in-house training
4 week yearly continuing education.

EDUCATION AND CERTIFICATIONS

Degree Program(s)

University of Florida (Gainesville, FL)

Master of Science, Forensic Drug Chemistry, 2006

University of Florida (Gainesville, FL)

Master of Science, Forensic Toxicology, 2005

Eastern Kentucky University (Richmond, KY)

Bachelor of Science, Forensic Chemistry, 2001

Minor in Political Science

PROFESSIONAL AFFILIATIONS

Southwestern Association of Forensic Scientists (SWAFS), 2013-Present



U. S. Department of Justice
Drug Enforcement Administration
South Central Laboratory
10150 Technology Blvd., E.
Dallas, Texas 75220

www.dea.gov

April 4, 2023

TO: Heather Rattan
Assistant United States Attorney

FROM: Angela Cassady
Senior Forensic Chemist

SUBJECT: RULE 16(a)(1)(G) SUMMARY OF TESTIMONY IN UNITED STATES v.
Debra Mercer- Erwin, ET. AL.

Reference Laboratory Report(s) and Analyst Notes for DEA LIMS Case Number(s):
2021-SFL6-03586

The following summary of testimony is provided as required by Federal Rule of Criminal Procedure 16(a)(1)(G) and is a complete statement of my opinions, which are exclusive to and address only the exhibit(s) identified in this summary:

1. My name is: Angela Cassady
2. I am employed by the U.S. Department of Justice, Drug Enforcement Administration (DEA), in the capacity of forensic chemist, and was so employed when I conducted the examinations and analyses described in the attached laboratory report(s) and analyst notes. My qualifications to conduct the examinations and analyses, and to express an opinion as to the identity of the material contained in the exhibit(s) described in the attached laboratory report(s), are based on my knowledge, skill, experience, training, and education. See my attached Curriculum Vitae for additional information regarding my qualifications, including previous testimony offered in the last four years and any publications authored in the last ten years.
3. The opinions described in the attached laboratory report(s) and analyst notes are based on chemical, physical, and instrumental analyses, the results generated by those analyses, and my interpretation of those results set forth in the attached laboratory report(s) and analyst notes. The manner and process by which I performed the analyses were, to the best of my knowledge, in accordance with the publicly available Analysis of Drugs Manual (ADM) and Laboratory Operations Manual (LOM), in effect at the time of analysis. These are generally available at:

https://www.dea.gov/resources/documents?f%5B0%5D=publication_type%3A2596, or were otherwise disclosed upon request.

SUBJECT: RULE 16(a)(1)(G) SUMMARY OF TESTIMONY IN UNITED STATES v.
Debra Mercer- Erwin, ET. AL.

DEA LIMS Case Number(s): 2021-SFL6-03586

4. I analyzed the material contained in the exhibit(s) which were submitted for analysis in the above referenced case number(s). My conclusions are included as part of the attached forensic laboratory report(s) and analysts notes.
5. The analytical methods used in the analyses are validated and verified according to our assurance policy to ensure the methods are reliable and fit-for-purpose and the techniques utilized are widely accepted and employed in the scientific and forensic community. Summaries of instrumental methods are available at:

https://www.dea.gov/resources/documents?f%5B0%5D=publication_type%3A2596

Pursuant to Fed. R. Crim. P. 16(a)(1)(G)(v), I approve the foregoing disclosure.

Angela Cassady

Angela Cassady

Senior Forensic Chemist

April 4, 2023

Date

APPROVED:

B. Jamie Vasquez

B. Jamie Vasquez

Associate Laboratory Director

Attachments

Case Details Report

» I.A. Case #: REDACTED / LIMS Case #: 2021-SFL6-03586

Investigating Agency: ICE - Dallas Office

of I.A. Exhibits: 1

of Lab Exhibits: 4

Exhibit #	Lab Ex #	Lab Exhibit Description	Container
1	1	25 multilayered bundles containing white powder.	Box (1869835)

Gross Weight		Analyst: AMCASSADY (2021.05.18)
Equipment : DEA 361259		
Gross Weight (Reported)	28.4 kg	
Gross Weight (Actual)	28396.9 g	
Gross Weight (delta)	3.1 g	
Gross Weight (delta %)	0.01 %	
Weight Discrepancy	No	
Remarks	No Remarks	

Description of Evidence		Analyst: AMCASSADY (2021.05.18)
Seals	Intact	
Date Opened	2021-05-13	
Description	2 SSEEs containing a total of 25 multi-layered bundles containing white powder. Bundles are layers of clear tape or brown tape, carbon paper, black rubber and heat-seal bags. 2 of the bundles are open and co-mingled.	
Consistent With Paperwork?	Yes	
Remarks	No Remarks	

Description of Exhibit and Sampling		Analyst: AMCASSADY (2021.05.18)
Number of Packages	25 unit	
Number of Units	25 unit	
Package Type	Multilayered Packaging	
Logo/Impression	Yes	
Gross Form	Powder	
Dry/Moist	Dry	
Exemplar	No	
Required Number of Units to Test	16 unit	
Number of Units Tested	16 unit	
Sampling Procedure	16 Randomly selected (lottery method A) bundles analyzed using GCMS and Cobalt II Thiocyanate color test.	
Deviation from Sampling Plan	No	
Remarks	No Remarks	

Net Weight		Analyst: AMCASSADY (2021.05.18)
Equipment : DEA 361269		
Residue	No	
Type of Weighing	Contents Extrapolation	
Net Weight	25 kg	
Net Weight Uncertainty	0.06 kg	
Number of Units	25	
Remarks	E-F 9 New ZPBs	
Use Legacy Calculator	No	

» I.A. Case #: REDACTED / LIMS Case #: 2021-SFL6-0358711

Exhibit #	Lab Ex #	Lab Exhibit Description	Container
1	1	25 multilayered bundles containing white powder.	Box (1869835)

Cobalt (II) Thiocyanate Color Test : Run # 1 - Set # 1

Analyst: AMCASSADY (2021.05.18)

Negative Control Run	Yes
Negative Control Result	Pass
Reagent ID	COB-G2-022521
Remarks	No Remarks

Cobalt (II) Thiocyanate Color Test : Run # 1 - Set # 2 Samples

Analyst: AMCASSADY (2021.05.18)

Negative Control Run	No
Reagent ID	COB-G2-022521
Applicable Units	1-16
Color	Blue
Color with HCl addition	N/A
Remarks	No Remarks

GC-MS Analysis : Run # 1 - Set # 1

Analyst: AMCASSADY (2021.05.21)

Equipment : DEA 361394

Negative Control Run	Yes
Negative Control Type	Instrumental/Solvent
Negative Control Result	Pass
Solvent	MeOH
Remarks	No Remarks

GC-MS Analysis : Run # 1 - Set # 2 Bundle 1

Analyst: AMCASSADY (2021.05.21)

Equipment : DEA 361394

Negative Control Run	No
Sample Weighed	No
Solvent	MeOH
Retention Time Matching	No
Remarks	Extraneous ions do not interfere with identification. Extraneous peaks are due to cocaine breakdown,

Spectral Result

Constituent	Comments
Cocaine, Salt Undetermined	---

GC-MS Analysis : Run # 1 - Set # 3 Bundle 2

Analyst: AMCASSADY (2021.05.21)

Equipment : DEA 361394

Negative Control Run	No
Sample Weighed	No
Solvent	MeOH
Retention Time Matching	No
Remarks	Extraneous ions do not interfere with identification. Extraneous peaks are due to cocaine breakdown,

Spectral Result

Constituent	Comments
Cocaine, Salt Undetermined	---

» I.A. Case #: REDACTED / LIMS Case #: 2021-SFL6-03586

Exhibit #	Lab Ex #	Lab Exhibit Description	Container
1	1	25 multilayered bundles containing white powder.	Box (1869835)

GC-MS Analysis : Run # 1 - Set # 4 Bundle 3 Analyst: AMCASSADY (2021.05.21)

Equipment : DEA 361394

Negative Control Run	No
Sample Weighed	No
Solvent	MeOH
Retention Time Matching	No
Remarks	Extraneous ions do not interfere with identification. Extraneous peaks are due to cocaine breakdown,

Spectral Result

Constituent	Comments
Cocaine, Salt Undetermined	---

GC-MS Analysis : Run # 1 - Set # 5 Bundle 4 Analyst: AMCASSADY (2021.05.21)

Equipment : DEA 361394

Negative Control Run	No
Sample Weighed	No
Solvent	MeOH
Retention Time Matching	No
Remarks	Extraneous ions do not interfere with identification. Extraneous peaks are due to cocaine breakdown,

Spectral Result

Constituent	Comments
Cocaine, Salt Undetermined	---

GC-MS Analysis : Run # 1 - Set # 6 Bundle 5 Analyst: AMCASSADY (2021.05.21)

Equipment : DEA 361394

Negative Control Run	No
Sample Weighed	No
Solvent	MeOH
Retention Time Matching	No
Remarks	Extraneous ions do not interfere with identification. Extraneous peaks are due to cocaine breakdown,

Spectral Result

Constituent	Comments
Cocaine, Salt Undetermined	---

» I.A. Case #: REDACTED / LIMS Case #: 2021-SFL6-03586

Exhibit #	Lab Ex #	Lab Exhibit Description	Container
1	1	25 multilayered bundles containing white powder.	Box (1869835)

GC-MS Analysis : Run # 1 - Set # 7 Bundle 6 Analyst: AMCASSADY (2021.05.21)**Equipment : DEA 361394**

Negative Control Run	No
Sample Weighed	No
Solvent	MeOH
Retention Time Matching	No
Remarks	Extraneous ions do not interfere with identification. Extraneous peaks are due to cocaine breakdown,

Spectral Result

Constituent	Comments
Cocaine, Salt Undetermined	---

GC-MS Analysis : Run # 1 - Set # 8 Bundle 7 Analyst: AMCASSADY (2021.05.21)**Equipment : DEA 361394**

Negative Control Run	No
Sample Weighed	No
Solvent	MeOH
Retention Time Matching	No
Remarks	Extraneous ions do not interfere with identification. Extraneous peaks are due to cocaine breakdown,

Spectral Result

Constituent	Comments
Cocaine, Salt Undetermined	---

GC-MS Analysis : Run # 1 - Set # 9 Bundle 8 Analyst: AMCASSADY (2021.05.21)**Equipment : DEA 361394**

Negative Control Run	No
Sample Weighed	No
Solvent	MeOH
Retention Time Matching	No
Remarks	Extraneous ions do not interfere with identification. Extraneous peaks are due to cocaine breakdown,

Spectral Result

Constituent	Comments
Cocaine, Salt Undetermined	---

» I.A. Case #: REDACTED / LIMS Case #: 2021-SFL6-03586

Exhibit #	Lab Ex #	Lab Exhibit Description	Container
1	1	25 multilayered bundles containing white powder.	Box (1869835)

GC-MS Analysis : Run # 1 - Set # 10 Bundle 9

Analyst: AMCASSADY (2021.05.21)

Equipment : DEA 361394

Negative Control Run	No
Sample Weighed	No
Solvent	MeOH
Retention Time Matching	No
Remarks	Extraneous ions do not interfere with identification. Extraneous peaks are due to cocaine breakdown,

Spectral Result

Constituent	Comments
Cocaine, Salt Undetermined	---

GC-MS Analysis : Run # 1 - Set # 11 Bundle 10

Analyst: AMCASSADY (2021.05.21)

Equipment : DEA 361394

Negative Control Run	No
Sample Weighed	No
Solvent	MeOH
Retention Time Matching	No
Remarks	Extraneous ions do not interfere with identification. Extraneous peaks are due to cocaine breakdown,

Spectral Result

Constituent	Comments
Cocaine, Salt Undetermined	---

GC-MS Analysis : Run # 1 - Set # 12 Bundle 11

Analyst: AMCASSADY (2021.05.21)

Equipment : DEA 361394

Negative Control Run	No
Sample Weighed	No
Solvent	MeOH
Retention Time Matching	No
Remarks	Extraneous ions do not interfere with identification. Extraneous peaks are due to cocaine breakdown,

Spectral Result

Constituent	Comments
Cocaine, Salt Undetermined	---

» I.A. Case #: REDACTED / LIMS Case #: 2021-SFL6-03586

Exhibit #	Lab Ex #	Lab Exhibit Description	Container
1	1	25 multilayered bundles containing white powder.	Box (1869835)

GC-MS Analysis : Run # 1 - Set # 13 Bundle 12

Analyst: AMCASSADY (2021.05.21)

Equipment : DEA 361394

Negative Control Run	No
Sample Weighed	No
Solvent	MeOH
Retention Time Matching	No
Remarks	Extraneous ions do not interfere with identification. Extraneous peaks are due to cocaine breakdown,

Spectral Result

Constituent	Comments
Cocaine, Salt Undetermined	---

GC-MS Analysis : Run # 1 - Set # 14 Bundle 13

Analyst: AMCASSADY (2021.05.21)

Equipment : DEA 361394

Negative Control Run	No
Sample Weighed	No
Solvent	MeOH
Retention Time Matching	No
Remarks	Extraneous ions do not interfere with identification. Extraneous peaks are due to cocaine breakdown,

Spectral Result

Constituent	Comments
Cocaine, Salt Undetermined	---

GC-MS Analysis : Run # 1 - Set # 15 Bundle 14

Analyst: AMCASSADY (2021.05.21)

Equipment : DEA 361394

Negative Control Run	No
Sample Weighed	No
Solvent	MeOH
Retention Time Matching	No
Remarks	Extraneous ions do not interfere with identification. Extraneous peaks are due to cocaine breakdown,

Spectral Result

Constituent	Comments
Cocaine, Salt Undetermined	---

» I.A. Case #: REDACTED / LIMS Case #: 2021-SFL6-03586

Exhibit #	Lab Ex #	Lab Exhibit Description	Container
1	1	25 multilayered bundles containing white powder.	Box (1869835)

GC-MS Analysis : Run # 1 - Set # 16 Bundle 15

Analyst: AMCASSADY (2021.05.21)

Equipment : DEA 361394

Negative Control Run	No
Sample Weighed	No
Solvent	MeOH
Retention Time Matching	No
Remarks	Extraneous ions do not interfere with identification. Extraneous peaks are due to cocaine breakdown,

Spectral Result

Constituent	Comments
Cocaine, Salt Undetermined	---

GC-MS Analysis : Run # 1 - Set # 17 Bundle 16

Analyst: AMCASSADY (2021.05.21)

Equipment : DEA 361394

Negative Control Run	No
Sample Weighed	No
Solvent	MeOH
Retention Time Matching	No
Remarks	Extraneous peaks are due to cocaine breakdown,

Spectral Result

Constituent	Comments
Cocaine, Salt Undetermined	---

Exemplar Weight Removed

Analyst: AMCASSADY (2021.05.18)

Amount of Exemplar Removed	3.4827 g
Remarks	No Remarks

Reserve Weight

Analyst: AMCASSADY (2021.05.18)

Residue?	No
Type of Calculation	No Calculation
Reserve Weight	25.001 kg
Remarks	No Remarks

Description of Reserve Evidence

Analyst: AMCASSADY (2021.05.18)

Equipment : DEA 361249

Description	Box 1 - 9 opened bundles into new ZPBs (9). ZPBs into new SSEE. SSEE and original SSEE into new box
	Box 2 - 2 opened bundles (comingled) into new ZPB. ZPB and 6 unopened bundles into new SSEE. One SSEE of original bundle wrappings, other SSEE and original SSEE into new box.
	Box 3 - 8 unopened bundles into new SSEE. One SSEE of original bundle wrappings and other SSEE into new box.
Date Sealed	2021-05-18
Remarks	No Remarks

» I.A. Case #: REDACTED / LIMS Case #: 2021-SFL6-0358617

Exhibit #	Lab Ex #	Lab Exhibit Description	Container
1	1	25 multilayered bundles containing white powder.	Box (1869835)

Gross Weight After Analysis		Analyst: AMCASSADY (2021.05.18)
Equipment : DEA 361249		
Gross Weight After Analysis	31399.4 g	
Remarks	No Remarks	

Summary of Findings		Analyst: AMCASSADY (2021.05.18)			
Findings					
Exhibit	Gross Wt	Net Wt (Reported)	Net Wt	Reserve Wt	Retained Wt
1	28.39 kg	25.00 kg ± 0.06 kg	25005.3 g ± 62.3275 g	25.00 kg	
Constituent	Purity	APD (Reported)		APD	
Cocaine					

Fountainhead		Analyst: AMCASSADY (2021.05.18)
Description of Impression/Marking/Logo	"007" (7), "Fendi"(5), scorpion(3), Disney Logo (10)	
Color and/or Type of Package	Bundles are layers of clear tape or brown tape, cabon paper, black rubber and heat-seal bags.	
Number of Packages	25	
Remarks	N/A	

» I.A. Case #: REDACTED / LIMS Case #: 2021-SFL6-03586

Exhibit #	Lab Ex #	Lab Exhibit Description	Container
1	1	Additional Unit	Box (1869837)

Additional Evidence Unit

Analyst: AMCASSADY (2021.05.13)

Remarks

All tests listed in Unit 1

» I.A. Case #: REDACTED / LIMS Case #: 2021-SFL6-0358619

Exhibit #	Lab Ex #	Lab Exhibit Description	Container
1	1	CSP Samples	SSEE (1877169)

CSP Sample Weight		Analyst: AMCASSADY (2021.05.13)
Equipment : DEA 361123		
Number of Samples	3	
CSP Total Sample Weight	3.4827 g	
CSP Average Sample Weight	1.1609 g	
Remarks	No Remarks	

Description of Reserve Evidence		Analyst: AMCASSADY (2021.05.13)
Description	CSP Samples into 3 new vials. Vials into new SSEE.	
Date Sealed	2021-05-13	
Remarks	No Remarks	

Gross Weight - SP/LP		Analyst: AMCASSADY (2021.05.13)
Equipment : DEA 361249		
Gross Weight	81.2 g	
Remarks	No Remarks	

» I.A. Case #: REDACTED / LIMS Case #: 2021-SFL6-03586

Exhibit #	Lab Ex #	Lab Exhibit Description	Container
1	1	Additional Unit	Box (1877637)

Additional Evidence Unit

Analyst: AMCASSADY (2021.05.13)

Remarks

All tests listed in Unit 1